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*Attorneys for Plaintiff*  
\*Pro hac vice *forthcoming*

UNITED STATES DISTRICT COURT,  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

HALEY CLEMENTS,

*Plaintiff,*

vs.

XAVIER BECERRA, as Secretary of  
the Department of Health & Human  
Services; the UNITED STATES  
DEPARTMENT OF HEALTH &  
HUMAN SERVICES, a federal  
department; CAROLE JOHNSON, as  
Administrator of the Health Resources  
& Services Administration; and the  
HEALTH RESOURCES & SERVICES  
ADMINISTRATION, a federal agency,

*Defendants.*

No. 2:24-cv-00567-RAH-SMD

**Motion for Admission  
*Pro Hac Vice*  
of Molly E. Danahy**

Pursuant to Middle District of Alabama Local Rule 83.1(b), I declare that the following facts are true to the best of my knowledge, information, and belief:

1. My full name is Molly Elizabeth Danahy. I reside in Helena, Montana.
2. I practice at the following firm:

Upper Seven Law  
P.O. Box 31  
Helena, MT 59624  
Telephone: (406) 396-3373

3. I am a member of the following bars: 1) Maryland Court of Appeals (2022); (2) District of Columbia Court of Appeals (2019); (3) New York State Court of Appeals (2017); (4) Supreme Court of the United States (2021); (5) U.S. Court of Appeals for the Third Circuit (2024); (6) U.S. Court of Appeals for the Ninth Circuit (2023); (7) U.S. Court of Appeals for the Eighth Circuit (2023); (8) U.S. Court of Appeals for the Sixth Circuit (2020); (9) U.S. Court of Appeals for the Fifth Circuit (2020); (10) U.S. Court of Appeals for the D.C. Circuit (2020); (11) U.S. Court of Appeals for the Eleventh Circuit (2019); (12) U.S. District Court for the District of North Dakota (2022); (13) U.S. District Court for the District of Maryland (2020); (14)



U.S. District Court for the District of Columbia (2019). My application for admission to the Montana Bar is pending.

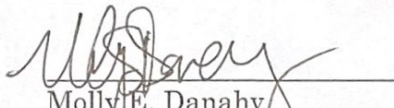
4. I am in good standing in all state and federal bars of which I am a member.

5. A current certificate of good standing from the United States District Court for the District of Maryland is attached as **Exhibit 1**.

6. I have read the rules of this Court concerning admission of a visiting attorney, and I will abide by them

7. Based on the foregoing, I respectfully request that I be granted *pro hac vice* admission in this matter on behalf of Plaintiff Haley Clements.

Respectfully submitted this 17th day of September, 2024.

  
Molly E. Danahy  
Upper Seven Law  
P.O. Box 31  
Helena, MT  
(406) 998-6067

### CERTIFICATE OF SERVICE

I hereby certify that I served true and accurate copies of the foregoing motion upon the following by first-class mail:

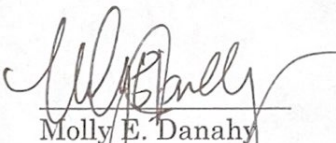
Xavier Becerra, as Secretary of the Department of Health & Human Services  
c/o General Counsel, Department of Health and Human Services  
200 Independence Ave, S.W.  
Washington, D.C. 20201

United States Department of Health & Human Services  
c/o General Counsel, Department of Health and Human Services  
200 Independence Ave, S.W.  
Washington, D.C. 20201

Carole Johnson, as Administrator of the Health Resources & Services Administration  
c/o General Counsel, Department of Health and Human Services  
200 Independence Ave, S.W.  
Washington, D.C. 20201

Health Resources & Services Administration  
c/o General Counsel, Department of Health and Human Services  
200 Independence Ave, S.W.  
Washington, D.C. 20201

Dated this 17th day of September, 2024



Molly E. Danahy  
Upper Seven Law

# **Exhibit 1**

Certificate of Good Standing from  
The U.S. District Court for The District of  
Maryland



# Certificate of Good Standing

## UNITED STATES DISTRICT COURT DISTRICT OF MARYLAND

I, Catherine M. Stavlas, Clerk of the United States District Court for the District of Maryland, certify that Molly E. Danahy, Bar No. 21266, was duly admitted to practice in this Court on 2/28/2020, and is in good standing as a member of the Bar of this Court.



Clerk of Court

Date: 9/11/2024

Marlowe Hill  
Deputy Clerk

*This Certificate is valid for 90 days from the date issued.*